

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF WESTERN WASHINGTON

In re:

THEODORE L. COPELAND,

Debtor,

THEODORE L. COPELAND,

Plaintiff,

vs.

EMIEL A. KANDI and his marital community;  
DIVERSIFIED FINANCIAL, INC.; JASON M.  
WONG; and JUANITA C. KANDI,

Defendants.

CASE NO. 08-45008

Chapter 13

ADVERSARY NO. 10-4026

**DEFENDANT JASON WONG'S  
OBJECTIONS TO PLAINTIFF'S  
AMENDED EXHIBITS LIST**

Pursuant to this Court's April 8, 2010, Scheduling Order and Fed. R. Civ. P.  
26(a)(3)(B), defendant Jason Wong submits the following objections to Plaintiff's Amended  
Exhibits List (Dkt. #77):

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED  
EXHIBITS LIST – PAGE 1

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No.	Date	Description	Objection
1.	6/28/10	Superior Court case No. 08-2-13603-1 Case summary	Federal Rules of Evidence 802 (hearsay) and 901 (authenticity). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
2.	10/17/08	Case No. 08-2-13603-1: MOTION TO SET ASIDE DECLARATION	Federal Rules of Evidence 802 (hearsay) and 901 (authenticity)
3.	10/31/08	Case No. 08-2-13603-1: AFFIDAVIT/DECLARATION OF SERVICE	Federal Rules of Evidence 802 (hearsay) and 901 (authenticity)
4.	11/03/08	Case No. 08-2-13603-1: DECLARATION OF EMIEL KANDI	Federal Rule of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
5.	11/03/08	Case No. 08-2-13603-1: DECLARATION OF MARLA SPENCER	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
6.	11/03/08	Case No. 08-2-13603-1: DECLARATION OF JASON WONG	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
7.	11/12/08	Case No. 08-2-13603-1: DECLARATION OF MARTIN BURNS	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
8.	11/12/08	Case No. 08-2-13603-1: DECLARATION OF KLAUS ELLIOT	Federal Rules of Evidence 802 (hearsay) and 901 (authenticity)
9.	11/19/08	Case No. 08-2-13603-1: RESPONSE IN OPPOSITION	Federal Rules of Evidence 402 and 403 objections reserved for trial
10.	11/19/08	Case No. 08-2-13603-1: DECLARATION OF EMIEL KANDI	Federal Rules of Evidence 802 (hearsay) and 901 (authenticity)
11.	5/13/09	Case No. 08-2-13603-1: MOTION FOR PARTIAL SUMMARY JUDGMENT	Federal Rules of Evidence 402 and 403 objections reserved for trial
12.	5/13/09	Case No. 08-2-13603-1: DECLARATION OF EMIEL KANDI	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
13.	5/13/09	Case No. 08-2-13603-1: DECLARATION OF JASON WONG	Federal Rules of Evidence 802 (hearsay) and 402 (relevance)

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED  
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No.	Date	Description	Objection
14.	6/01/09	Case No. 08-2-13603-1: RESPONSE IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
15.	6/01/09	Case No. 08-2-13603-1: DECLARATION OF MARTIN BURNS IN OPPOSITION TO MOTION	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
16.	6/01/09	Case No. 08-2-13603-1: DECLARATION OF DONNA CANTY	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
17.	6/01/09	Case No. 08-2-13603-1: DECLARATION OF JEFFERSON F MARSH JR	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
18.	6/01/09	Case No. 08-2-13603-1: DECLARATION OF DENISE L LOPEZ	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
19.	6/01/09	Case No. 08-2-13603-1: DECLARATION OF THEODORE LENALL COPELAND	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
20.	6/03/09	Case No. 08-2-13603-1: DECLARATION OF MARTIN BURNS IN SUPPORT OF MOTION TO RESTRAIN	Federal Rule of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
21.	6/08/09	Case No. 08-2-13603-1: REPLY	Federal Rule of Evidence 402 (relevance)
22.	6/08/09	Case No. 08-2-13603-1: DECLARATION OF EMIEL KANDI	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
23.	6/08/09	Case No. 08-2-13603:1: DECLARATION OF JASON WONG	Federal Rules of Evidence 802 (hearsay) and 402 (relevance)
24.	6/10/09	Case No. 08-2-13603-1: MEMORANDUM IN OPPOSITION	Federal Rules of Evidence 402 and 403 objections reserved for trial
25.	9/2/09	Case No. 08-2-13603-1: MOTION FOR PARTIAL SUMMARY JUDGMENT	Federal Rule of Evidence 402 (relevance)

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED  
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No.	Date	Description	Objection
26.	9/2/09	Case No. 08-2-13603-1: DECLARATION OF JUANITA KANDI	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
27.	10/20/09	Case No. 08-2-13603-1: NOTICE OF ABSENCE/UNAVAILABILITY	Federal Rules of Evidence 802 (hearsay) and 402 (relevance)
28.	4/21/10	NOTICE OF TRUSTEE SALE	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
29.	4/05/06	WATER WELL REPORT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
30.	8/07/08	REAL ESTATE CONTRACT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
31.	9/08/08	EXCISE TAX AFFIDAVIT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED  
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No.	Date	Description	Objection
32.	9/30/08	EXCISE TAX AFFIDAVIT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
33.	1/15/09	EXCISE TAX AFFIDAVIT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
34.	7/22/08	DEED OF TRUST	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
35.	9/18/08	EXCISE TAX AFFIDAVIT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED  
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No.	Date	Description	Objection
36.	11/13/08	DEED OF TRUST	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
37.	8/11/09	Case No. 08-45008: Exhibit A of MOTION TO CLARIFY (Wongs Bar suspension)	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
38.	8/11/09	Case No. 08-45008: Exhibit B of MOTION TO CLARIFY (Emiel Ali Kandi's Corporations)	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
39.	9/04/09	Return to sender mail (D Street Marina)	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
40.	3/16/10	Case No. 08-45008: Partial transcript of 9/09/09 digitally recorded hearing	Incomplete document
41.	8/12/09	Case No. 08-45008 DECLARATION OF THEODORE L. COPELAND	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
42.	1/29/10	Case no. 10-04026: COMPLAINT	Federal Rules of Evidence 802 (hearsay) and 402 (relevance)
43.	6/28/10	King County case no. 09-2-25191-6 (Provost v. Kandi): CASE SUMMARY	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
44.	7/06/09	King County case no. 09-2-25191-6 (Provost v. Kandi): COMPLAINT	Federal Rule of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
45.	3/16/10	King County case no. 09-2-25191-6 (Provost v. Kandi): DECLARATION OF LEN COPELAND	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED EXHIBITS LIST -- PAGE 6

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No.	Date	Description	Objection
46.	5/30/10	King County case no. 09-2-25191-6 (Provost v. Kandi): JUDGEMENT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
47.	9/06/07	Pierce County case No. 06-2-11086-8 (DALAL AL-SAUD v. DIVERSIFIED FINANCIAL): COMPLAINT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
48.	8/11/09	Pierce County case No. 08-2-0790-2 (RIDLEY v. KANDI): COMPLAINT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
49.	1/29/10	Case No. 10-04026: COMPLAINT	Federal Rules of Evidence 802 (hearsay) and 402 (relevance)
50.	6/28/10	Pierce County case No. 09-2-11247-4 (MARSH v. Kandi) CASE SUMMARY	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
51.	7/16/09	Pierce County case No. 09-2-04683-8 (MARSH v. Kandi): COMPLAINT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
52.	1/13/09	Pierce County case No.: 09-2-11247-4 (MARTIN v. Kandi) COMPLAINT	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
53.	5/14/10	Letter from Emiel Kandi to David Leen	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance).
54.	6/28/10	LINX NAME SEARCH OF DEFENDANTS KANDI	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
55.	6/15/10	DECLARATION OF LEE HERMANN	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance). In addition, plaintiff has not provided a copy of this document or adequately described it. Defendant Wong reserves the right to make additional objections to this document after he has the opportunity to review it.
56.	2/08/10	JUANITA KANDI'S ANSWERS TO INTERROGATORIES FROM STATE COURT CASE	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
57.	9/17/09	Sprint cell phone records for no. (253) 405-6844	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED EXHIBITS LIST – PAGE 7

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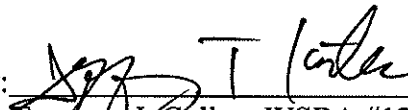
No.	Date	Description	Objection
58.	3/17/10	Qwest land line records for no. (253) 565-7700	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)
59.	2/01/06	Internet Blog post by Emiel Kandi	Federal Rules of Evidence 802 (hearsay), 901 (authenticity), and 402 (relevance)

Defendant Wong reserves the right to make objections at trial to any the exhibits pursuant to Federal Rules of Evidence 402 and 403.

DATED this 7th day of July, 2010.

FORSBERG & UMLAUF, P.S.

By:

  
Terrence J. Cullen, WSBA #12554  
Jeffrey T. Kestle, WSBA #29648  
Attorneys for Defendant Jason M. Wong



1 **CERTIFICATE OF SERVICE**

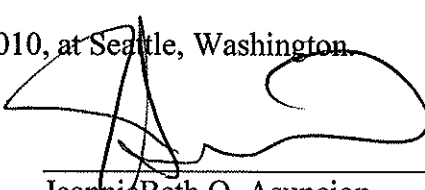
2 The undersigned certifies under the penalty of perjury under the laws of the State of  
3 Washington that I am now and at all times herein mentioned, a citizen of the United States, a  
4 resident of the State of Washington, over the age of eighteen years, not a party to or interested  
5 in the above-entitled action, and competent to be a witness herein.

6 On the date given below I caused to be served the foregoing DEFENDANT JASON  
7 WONG'S OBJECTIONS TO CERTAIN EXHIBITS IDENTIFIED IN PLAINTIFF'S TRIAL  
8 EXHIBIT LISTS on the following individuals in the manner indicated:

9 Mr. Theodore L. Copeland  
10 12411 Beverly Ct. S.W. #6-1  
11 Lakewood, WA 98499  
12 ( ) Via U.S. Mail  
( ) Via Facsimile  
( ☒ ) Via Hand Delivery  
( ) Via ECF

13 Mr. Thomas P. Quinlan, II  
14 Miller, Quinlan & Auter, P.S.  
15 1019 Regents Blvd., Suite 204  
16 Fircrest, WA 98466  
17 Facsimile: 1-253-564-5007  
( ) Via U.S. Mail  
( ) Via Facsimile  
( ) Via Hand Delivery  
( ☒ ) Via ECF

18  
19 SIGNED this 7th day of July, 2010, at Seattle, Washington.

20   
21 \_\_\_\_\_  
22 Jeannie Beth O. Asuncion  
23

DEFENDANT JASON WONG'S OBJECTIONS TO PLAINTIFF'S AMENDED  
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